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18 June 2020

Ron Beatty
Principal Adviser Market Services
Electricity Authority
Level 7 Harbour City Tower
PO Box 10041
WELLINGTON 6143

Dear Ron

Re: Addendum to the Medically Dependent Consumer guidelines, and the Vulnerable Consumer guidelines

Thank you for the opportunity to provide feedback on the addendum and for taking on board the comments of the working group which we can see reflected in this draft.

Given the collaborative approach taken to this addendum, and the feedback incorporated to date, Genesis is broadly comfortable with the addendum and welcomes the additional clarity it will provide.

We have three comments which relate to areas where we think small improvements can still be made. They are:

- 1 In relation to 10.3 b, d and e, we believe greater clarity can be provided. Specifically, what happens where medically dependent customer status is claimed, but remains unconfirmed, despite every effort being made by the retailer to seek confirmation?
- 2 The Authority notes in the addendum "if an account holder, medically dependent consumer, vulnerable consumer (MDC/VC) or alternate contact does not share information, a retailer has no way of knowing that there is an MDC/VC within the domestic premises". While terminology may differ between retailers, we think it would be useful for the language used to reflect that we can discuss/disclose account details with an 'authority' but not an 'alternate contact'.
- 3 Where the addendum reads "Retailers should not carry out remote disconnections at domestic premises that the retailer considers vacant if the current advanced meter's consumption records indicate that the premises are occupied" we think a better approach would be to amend the wording as follows "Retailers need to ensure reasonable steps are taken to make contact with the occupant of a domestic premises before carrying out vacant disconnections".

Should you have any questions on this submission or wish to discuss any matter raised please contact Prameeta Sami on 07 838 7833.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Louise Griffin', with a stylized flourish at the end.

Louise Griffin

Group Manager, Regulatory Affairs and Government Relations